

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

BORGWARNER INC., and BORGWARNER MORSE TEC INC.,  Plaintiffs,  v.  HILITE INTERNATIONAL, INC., AISIN SEIKI CO., LTD, and AISIN AUTOMOTIVE CASTING TENNESSEE, INC.  Defendants.	CIVIL ACTION NO. 07-C-3339  <b>The Honorable Mark Filip</b> <b>United States District Court Judge</b>  <b>Magistrate Judge Valdez</b>
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**DECLARATION OF PETER D. SIDDOWAY IN SUPPORT OF  
DEFENDANT HILITE INTERNATIONAL, INC.'S  
MOTION TO TRANSFER VENUE UNDER 28 U.S.C. § 1404(A)**

I, Peter D. Siddoway, hereby declare as follows:

1. I am an attorney at Jones Day, counsel of record for Hilite International, Inc. ("Hilite"). I have personal knowledge of the facts set forth herein and, if called upon to do so, could and would testify competently thereto.
2. Attached hereto as Exhibit A is a true and correct copy of a selected portion of the Hilite webpage.
3. Attached hereto as Exhibit B is a true and correct copy of the Civil Docket for the Prior Delaware Action.
4. Attached hereto as Exhibit C is a true and correct copy of selected pages from a Complaint for Patent Infringement filed in the U.S. District Court for the District of Delaware by Aisin Sieki Co., Ltd.

5. Attached hereto as Exhibit D is a true and correct copy of the civil docket for case # 1:07-cv-00512-SLR in the U.S. District Court for the District of Delaware.

6. Attached hereto as Exhibit E is a true and correct copy selected pages from Hitachi's Answering Brief Opposing Defendant's Motion Under Fed. R. Civ. P. 12(f) to Strike Plaintiff's Allegations of Inequitable Conduct in the Complaint in the Prior Delaware Action. (Ex. B, at docket entry 15.)

7. Attached hereto as Exhibit F is a true and correct copy of selected pages from the Redacted Public Version of Hitachi's Motion for Leave to File Third Amended Complaint in the Prior Delaware Action. (Ex. B, at docket entry 232)

8. Attached hereto as Exhibit G is a true and correct copy of selected pages from an Order in the Prior Delaware Action. (Ex. B, at docket entry 255.)

9. Attached hereto as Exhibit H is a true and correct copy of selected pages from the Seventh Discovery Order of the Special Master in the Prior Delaware Action. (Ex. B, at docket entry 247.)

10. Attached hereto as Exhibit I is a true and correct copy of selected pages from the Decision on Plaintiffs' Motion to Compel the Production of Withheld Prosecution Documents in the Prior Delaware Action. (Ex. B, at docket entry 248.)

11. Attached hereto as Exhibit J is a true and correct copy of selected pages from the Decision on Plaintiffs' Third Motion to Compel in the Prior Delaware Action. (Ex. B, at docket entry 258.)

12. Attached hereto as Exhibit K is a true and correct copy of selected pages from a redacted version of the Declaration of Lisa A. Schneider In Support of Borgwarner's Motion for Summary Judgment That the Butterfield Paper Submitted to IMECHE Does Not Constitute Prior

Art Under 35 U.S.C. Sections 102(a) or 102(b) in the Prior Delaware Action. (Ex. B, at docket entry 286.)

13. Attached hereto as Exhibit L is a true and correct copy of selected pages from a redacted version of the Supplemental Declaration of Lisa A. Schneider In Support of Borgwarner's Motion for Summary Judgment That the Butterfield Paper Submitted to IMECHE Does Not Constitute Prior Art Under 35 U.S.C. Sections 102(a) or 102(b) in the Prior Delaware Action. (Ex. B, at docket entry 353.)

14. Attached hereto as Exhibit M is a true and correct copy of selected pages from a Scheduling Order in the Prior Delaware Action. (Ex. B, at docket entry 38.)

15. Attached hereto as Exhibit N is a true and correct copy of selected pages from the Motion for Extension of Time to Stipulation and Order To Amend Schedule in the Prior Delaware Action. (Ex. B, at docket entry 297.)

Dated: November 16, 2007

s/ Peter D. Siddoway

Peter D. Siddoway